

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PROJECT VERITAS and PROJECT	:
VERITAS ACTION FUND,	: Civil Action No. 7:23-cv-04533
	:
Plaintiffs,	:
	:
-against-	: NOTICE OF MOTION FOR A
	: PRELIMINARY INJUNCTION
	:
JAMES O'KEEFE, TRANSPARENCY 1,	:
LLC d/b/a O'KEEFE MEDIA GROUP, RC	:
MAXWELL, and ANTHONY	:
IATROPOULOS,	:
	:
Defendants.	:
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PLEASE TAKE NOTICE THAT, upon the pleadings and papers in this matter, and the accompanying Memorandum of Law and exhibits filed herewith, Plaintiffs, Project Veritas and Project Veritas Action Fund, respectfully move this Court to enter a preliminary injunction against Defendants in the above-captioned matter pursuant to Fed. R. Civ. P. 65, enjoining Defendants James O'Keefe and Transparency 1, LLC d/b/a O'Keefe Media Group, from: (1) contacting or soliciting Plaintiffs' donors; (3) contacting or soliciting Plaintiffs' employees or contractors; (4) obtaining, using or disclosing any of Plaintiffs' Confidential Information (as defined in the Employment Agreement) in violation of the Employment Agreement's provisions regarding Confidential Information and under the Defend Trade Secrets Act; and (5) keeping and failing to return any and all property belonging to Plaintiffs, and for attorneys' fees and costs to obtain this injunctive relief.¹

Plaintiffs will move this Court for such an order before the Honorable Cathy Seibel, United States District Judge, in The Honorable Cathy Seibel, White Plains Courthouse, 300 Quarropas

¹ Such fees and costs to be liquidated upon subsequent application.

Street, White Plains, NY 10601, at 10:00 a.m. on Friday, June 21, 2024, or as soon thereafter as counsel may be heard, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE NOTICE that opposition papers, if any, shall be served in accordance with Local Civil Rule 6.1, and the applicable individual rules of practice.

Dated: May 29, 2024.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)
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Civil Action No. 7:23-cv-04533

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 29, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)